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**REMARKS**

Applicant has carefully reviewed and considered the Office Action mailed on November 27, 2002, and the references cited therewith. Claims 1, 5, 9 and 13 are amended and claims 17-24 are added; as a result, claims 1-24 are now pending in this application. Applicant has amended claims 1, 9 and 13 to remove language from the preamble of such claims. Applicant respectfully submits that these amendments are not narrowing and are not made for reasons related to patentability. Applicant does not admit that the cited references are prior art and reserves the right to "swear behind" each of the cited references as provided under 37 C.F.R. 1.131.

**§103 Rejection of the Claims**

Claims 1-16 were rejected under 35 USC § 103(a) as being unpatentable over Lawless et al. (U.S. 5,818,469) in view of Grossman et al. (U.S. 5,230,039). Applicant respectfully traverses these rejections.

In order for the Examiner to establish a *prima facie* case of obviousness, three base criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. M.P.E.P. § 2142 (citing *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed.Cir. 1991)).

Applicant respectfully submits that the Office Action does not make out a *prima facie* case of obviousness because the Office Action does not set forth a suggestion or motivation, either in the Lawless or Grossman references themselves or in the knowledge generally available to one of ordinary skill in the art to combine Lawless and Grossman. Therefore, Applicant respectfully requests such a suggestion or motivation or removal of the rejection to claims 1-16 over Lawless in view of Grossman.

Furthermore, Applicant respectfully submits that the Office Action does not make out a *prima facie* case of obviousness because, even if combined, the cited references fail to teach or suggest all of the elements of claims 1, 5, 9 and 13.

Among the differences, claims 1, 5, 9 and 13 recite “obtaining a texture usage mask of a subject texture.” The Office Action indicated that this limitation is disclosed by Lawless at column 3, line 5 to column 6, line 26, stating that Lawless teaches a method . . . obtaining a texture usage mask.” See Office Action at page 2. Applicant respectfully traverses this assertion. Applicant respectfully submits that Lawless does not teach the use of a mask value and, more particularly, Applicant respectfully submits that Lawless does not teach “a texture usage mask of a subject texture.”

Moreover, among the differences, claims 1 and 9 recite

ANDing the texture usage mask of the subject texture with the inverted context ID of the subject context to produce a resultant value; detecting that the subject texture is not being shared by another context with the subject context upon the resultant value being equal to 0 and detecting that the subject texture is being shared by another context with the subject context upon the resultant value not being equal to 0. (emphasis added).

With regard to claims 5 and 13, among the differences, claims 5 and 13 recite

performing a first logic operation with the texture usage mask of the subject texture and the context ID of the subject context to produce a resultant value; and detecting that the subject texture is not being shared by another context with the subject context upon the resultant value being equal to a first predetermined value and detecting that the subject texture is being shared by another context upon the resultant value being equal to a second predetermined value which is different from the first predetermined value. (emphasis added).

The Office Action indicated that “Lawless fails to specifically disclose ANDing the texture usage mask, the resultant value being equal to 0, and the resultant value not being equal to zero as claimed.” See Office Action at page 3. The Office Action further indicated that

"Grossman (col. 10, line 52 to col. 13, line 20; figs. 4-5b) indicates that it's well known to have texture mapping wherein a mask value is compared to determine if the resultant value is being equal to 0 base (sic) on the texture being used." See Office Action at page 3. The Office Action then makes the assumption that "[w]hen testing a particular texture is being used or not being used then it is testing the sharing of content of the texture." See Office Action at page 3.

Applicant respectfully traverses the assertion that a test to determine if an input coordinate is within a coordinate range for which texturing is enabled is the same as a test for sharing content of a texture. As noted in Grossman, the result of the mask and compare operation illustrated in blocks 503 and 504 of Figure 5a "determines whether or not an input coordinate is within a particular s,t coordinate range in which texturing is enabled." See Grossman at column 11, lines 14-16. Applicant respectfully submits that Grossman does not disclose or suggest the sharing of a texture by two different contexts. Therefore, Applicant respectfully submits that Grossman does not disclose or suggest detecting if two different contexts share a same texture based on a logical operation of a texture usage mask and an inverted context ID. In contrast, Grossman discloses an AND operation of a mask value with an outside map factor field that is indicative of values beyond a texture map. See Grossman at column 9, lines 29-41. Accordingly, Grossman does not teach a logical operation of either a texture usage mask or an inverted context ID.

Applicant, therefore, respectfully submits that neither Lawless nor Grossman, alone or in combination, disclose or suggest detection of sharing of textures based on a logical operation involving a texture usage mask in conjunction with an inverted context ID. Accordingly, these cited references fail to disclose all of the limitations of claim 1, 5, 9 and 13. Therefore, Applicant respectfully submits that the rejections of claims 1, 5, 9 and 13 have been overcome and that these claims are now in condition for allowance. Because claims 2-4, 6-8, 10-12 and 14-16 depend from and further define claims 1, 5, 9 and 13, respectively, Applicant respectfully submits that the rejections of claims 2-4, 6-8, 10-12 and 14-16 have been overcome and that these claims are now in condition for allowance.

New Claims

Claims 17-24 were added. Applicant respectfully submits that no new matter has been added. For at least the reasons set forth above, Applicant respectfully submits that claims 17-24 are in condition for allowance.

Conclusion

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney (612-349-9592) to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Commissioner of Patents, Washington, D.C. 20231, on this 28<sup>th</sup> day of April, 2003.

Name:

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Signature